

Exhibit 22

(Under Seal)

Privileged & Confidential
Reflecting advice of EU Outside Counsel

PR Comms Doc: Adweek /Antitrust Roundup
July 2020

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BACKGROUND **INTERNAL ONLY**

As early as Monday July 27, we expect Ronan Shields at Adweek will publish a roundup of recent antitrust scrutiny including the DOJ investigations into our ad tech business. He is not providing new reporting but wants to frame for readers where things stand and outline both the criticisms of Google and our defenses.

PRESS STRATEGY

- Brief reporter on background and point to recent commentary from our channels including:
 - [Ad tech is competitive](#) public comment
 - Our disclosures of [revenue share on our display business](#)
 - Our post on [how we help the top news publishers to monetize](#)
- Pointed to [recent reporting](#) on Fionna Scott Morton's advisory work for Apple and Amazon to ensure disclosure is included in his piece.

KEY MESSAGES

In ad tech, Google is one company among many in an industry that is famously crowded and competitive.

- There are thousands of companies operating in "ad tech" that work together and in competition with each other.
- We compete with many other companies in this space. Some of them are big, familiar names like Adobe, Amazon, AT&T, Comcast, Facebook, Oracle, and Verizon. Others—including Criteo, Index Exchange, MediaMath, OpenX, Rubicon Project and The Trade Desk—are less well-known outside the industry but operate important, scaled businesses.

Most advertisers and publishers use multiple ad tech products, simultaneously.

- Most advertisers and publishers work with multiple ad tech vendors simultaneously to get the best possible deal, achieve the best possible results or take advantage of innovative new offerings from startups or established players.
- In a study this year of 150 major digital publishers, Advertiser Perceptions found that the average publisher uses five supply-side platforms (SSPs) and plans to use six next year.
- The Wall Street Journal, for example, sells their inventory through 17 different platforms (see WSJ's ad.txt file).

Our tools and platforms make it easy for advertisers and publishers to choose whom they want to work with.

- Publishers use Google Ad Manager to sell ads to more than 700 advertising platforms, including Google's Display & Video 360 and Google Ads—but also Amazon, AT&T, Adobe, MediaMath and The Trade Desk, which are among the largest buyers on our exchange.
- In other words, our publisher platform sells much of its inventory through companies that compete directly with our advertising platforms.

The work we've been doing around cookies and ad identifiers is about privacy - period.

- Google is working in partnership with the wider industry through an open-source initiative, Privacy Sandbox (announced in summer 2019), an alternative to cookies that preserves privacy while enabling advertisers to protect their revenue and measure their campaigns, which will help protect the future of an accessible and ad supported internet.
- Safari and Mozilla have already phased out cookies for privacy reasons and we are very concerned that these blunt techniques unintentionally lead to a rise in less privacy as advertisers turn to more opaque techniques such as fingerprinting to track users (which users have no controls over).